

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT
RENEWAL

PERMITTEE

Greif Bros. Corporation
Attn: Harold Sechrest, Plant Manager
5 S. 220 Frontenac Road
Naperville, Illinois 60563

Application No.: 97070044

I.D. No.: 043467AAA

Applicant's Designation:

Date Received: October 18, 2002

Subject: Fiber Drum Manufacturing

Date Issued: TO BE DETERMINED

Expiration Date: 5 YEARS

Location: 5 S. 220 Frontenac Road, Naperville

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of drum painting, printing operations, caulk applicator, and QC Test process, pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
 - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic material to less than 100 tons per year, 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
 - ii. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. The drum coating applicator and the printing operation is subject to limitations of 35 IAC 218.204(c) for paper coating, which provides that:
 - a. The Permittee shall not apply at any time any coating in which the VOM content exceeds the following emission limitations. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:

kg/l
0.28

lb/gal
2.3

- b. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites.
3. Emissions and operation of equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
		<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
QC Test Process	Denat. Ethanol	2.3	22.8	2.3	22.8
Caulk Applicator	Caulk	---	0.6	---	0.6
Drum Painting	Coating	---	0.4	---	0.4
Printing	Water-based Inks	---	---	---	0.4

These limits are based on the maximum material usage and the maximum VOM content. Compliance with the annual limit for the QC Test Process shall be determined from a running total of 12 months of data.

Note: Denatured ethanol is not considered a photochemically reactive material as defined by 35 IAC 211.4690.

4. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- 5a. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements

established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

- b. The Permittee shall maintain records of the following items, and such other items as may be appropriate to allow the Illinois EPA to review compliance with the limits in this permit.
 - i. Pursuant to 35 IAC 218.211(c)(2), the Permittee shall collect and record all of the following information each day for the affected coating lines (drum coating applicator and the printing operation) and maintain the information at the source for a period of three years:
 - A. The name and identification number of each coating as applied on each affected coating line; and
 - B. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each affected coating line.
 - ii. Denatured alcohol usage (tons/month and tons/year);
 - iii. Caulk usage (tons/year);
 - iv. VOM and HAP content of each material used (wt. %); and
 - v. VOM and HAP emissions with supporting calculations and documentation (tons/month and tons/year).
- c. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 6. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
- 7. Two (2) copies of required reports and notifications concerning

equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

It should be noted that the Weather Pak Line and the drying oven are exempt from state permit requirements, pursuant to 35 IAC 201.146(iii) and (fff), respectively. Because these exempt units emit VOM, the potential emissions from each emission unit has been identified in Attachment A.

It should also be noted that the welding operations are exempt from state permit requirements, pursuant to 35 IAC 201.146(y).

If you have any questions on this, please call Jason Schnepf at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:JMS:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the fiber drum manufacturing facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, e.g., 100 tons per year of VOM at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled.

<u>Item of Equipment</u>	E M I S S I O N S (Tons/year)		
	<u>VOM</u>	<u>Single HAP</u>	<u>Total HAP</u>
QC Test Process	22.8		
Caulk Applicator	0.6		
Drum Painting	0.4		
Printing	0.4		
Weather Pak Line	0.05		
<u>Drying Oven</u>	<u>0.03</u>		
Totals	24.28	< 10	< 25

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